

EXHIBIT 4

Cody N. Brandon

From: Berger, Stephanie (CRT) <Stephanie.Berger@usdoj.gov>
Sent: Friday, September 27, 2024 11:09 AM
To: Cody N. Brandon; David M. Rudolph; Matthew P. Dykstra; Amanda Jordan
Cc: Szemanski, Ali (CRT); Bobrow, Anna (CRT); Faiella, Matthew (CRT); Diaz-Silveira, Krysten (CRT); Alexis Agathocleous; Alexis Alvarez; Jon Davidson; Rachel Meeropol; Stella Yarbrough; Jeff Preptit; Lucas Cameron-Vaughn; Lynly@transgenderlawcenter.org; External - Milo; dale@transgenderlawcenter.org
Subject: RE: United States v. Tennessee, W.D. Tenn. No. 24-2101 – Notice and Copies of Rule 45 Subpoenas

Cody,

I wanted to let you know that we have now received a response and documents from TDOC and from the Department of Safety and Homeland Security. We will assess whether these documents are fully responsive to our requests.

Thanks,
Stephanie

From: Berger, Stephanie (CRT)
Sent: Friday, September 27, 2024 9:59 AM
To: Cody N. Brandon <Cody.Brandon@ag.tn.gov>; David M. Rudolph <David.Rudolph@ag.tn.gov>; Matthew P. Dykstra <Matthew.Dykstra@ag.tn.gov>; Amanda Jordan <Amanda.Jordan@ag.tn.gov>
Cc: Szemanski, Ali (CRT) <Ali.Szemanski@usdoj.gov>; Bobrow, Anna (CRT) <Anna.Bobrow@usdoj.gov>; Faiella, Matthew (CRT) <Matthew.Faiella@usdoj.gov>; Diaz-Silveira, Krysten (CRT) <Krysten.Diaz-Silveira2@usdoj.gov>; Alexis Agathocleous <aAgathocleous@aclu.org>; Alexis Alvarez <alexisa@aclu.org>; Jon Davidson <JonDavidson@aclu.org>; Rachel Meeropol <rmeeropol@aclu.org>; Stella Yarbrough <syarbrough@aclu-tn.org>; Jeff Preptit <JPreptit@aclu-tn.org>; Lucas Cameron-Vaughn <Lucas@aclu-tn.org>; Lynly@transgenderlawcenter.org; External - Milo <milo@transgenderlawcenter.org>; dale@transgenderlawcenter.org
Subject: RE: United States v. Tennessee, W.D. Tenn. No. 24-2101 – Notice and Copies of Rule 45 Subpoenas

Hello Cody,

We do intend to produce any documents we receive in response to subpoenas in this action to you, as you noted, within a reasonable timeframe that it takes to turn those around. We have not yet received any responses to our subpoenas from the State entities. I am happy to update you if that changes today.

Thanks,
Stephanie

From: Cody N. Brandon <Cody.Brandon@ag.tn.gov>
Sent: Friday, September 27, 2024 8:35 AM
To: Berger, Stephanie (CRT) <Stephanie.Berger@usdoj.gov>; David M. Rudolph <David.Rudolph@ag.tn.gov>; Matthew P. Dykstra <Matthew.Dykstra@ag.tn.gov>; Amanda Jordan <Amanda.Jordan@ag.tn.gov>
Cc: Szemanski, Ali (CRT) <Ali.Szemanski@usdoj.gov>; Bobrow, Anna (CRT) <Anna.Bobrow@usdoj.gov>; Faiella, Matthew (CRT) <Matthew.Faiella@usdoj.gov>; Diaz-Silveira, Krysten (CRT) <Krysten.Diaz-Silveira2@usdoj.gov>; Alexis Agathocleous <aAgathocleous@aclu.org>; Alexis Alvarez <alexisa@aclu.org>; Jon Davidson <JonDavidson@aclu.org>; Rachel Meeropol <rmeeropol@aclu.org>; Stella Yarbrough <syarbrough@aclu-tn.org>; Jeff Preptit <JPreptit@aclu-tn.org>; Lucas Cameron-Vaughn <Lucas@aclu-tn.org>; Lynly@transgenderlawcenter.org; External - Milo

milo@transgenderlawcenter.org; dale@transgenderlawcenter.org

Subject: [EXTERNAL] RE: United States v. Tennessee, W.D. Tenn. No. 24-2101 – Notice and Copies of Rule 45 Subpoenas

Stephanie,

As you know, we have requested that you reproduce to us any documents and communications obtained pursuant to a subpoena in this action. (RFP# 22.) We, of course, are happy to allow a reasonable time for you to turn around those reproductions. But, given that the subpoenas you issued all have a production deadline of today at noon, and the State's deadline to respond to your motion is also today, please immediately notify me if you receive any documents in response to the subpoenas you issued. I think it is important for the Court to know whether you have received any of the documents you are asking for in your motion.

Cody

Cody N. Brandon
Managing Attorney
Phone: (615) 532-7400
Email: Cody.Brandon@ag.tn.gov



From: Berger, Stephanie (CRT) <Stephanie.Berger@usdoj.gov>

Sent: Thursday, September 12, 2024 2:18 PM

To: Cody N. Brandon <Cody.Brandon@ag.tn.gov>; David M. Rudolph <David.Rudolph@ag.tn.gov>; Matthew P. Dykstra <Matthew.Dykstra@ag.tn.gov>; Amanda Jordan <Amanda.Jordan@ag.tn.gov>

Cc: Szemanski, Ali (CRT) <Ali.Szemanski@usdoj.gov>; Bobrow, Anna (CRT) <Anna.Bobrow@usdoj.gov>; Faiella, Matthew (CRT) <Matthew.Faiella@usdoj.gov>; Diaz-Silveira, Krysten (CRT) <Krysten.Diaz-Silveira2@usdoj.gov>; Alexis Agathocleous <aAgathocleous@aclu.org>; Alexis Alvarez <alexisa@aclu.org>; Jon Davidson <JonDavidson@aclu.org>; Rachel Meeropol <rmeeropol@aclu.org>; Stella Yarbrough <syarbrough@aclu-tn.org>; Jeff Preptit <JPreptit@aclu-tn.org>; Lucas Cameron-Vaughn <Lucas@aclu-tn.org>; Lynly@transgenderlawcenter.org; External - Milo <milo@transgenderlawcenter.org>; dale@transgenderlawcenter.org

Subject: United States v. Tennessee, W.D. Tenn. No. 24-2101 – Notice and Copies of Rule 45 Subpoenas

Good afternoon,

Please find attached copies of subpoenas that the United States will issue and serve today in United States v. Tennessee, W.D. Tenn. No. 24-2101, pursuant to Federal Rule of Civil Procedure 45.

Cody, we still plan on filing a motion to compel on the issue discussed and will withdraw the subpoenas to the state agencies if the motion is granted. Please let us know if you can accept service by e-mail for the subpoena directed at the Attorney General's Office, or if not, who we can contact regarding service.

Sincerely,
Stephanie Berger

Stephanie Berger
Trial Attorney
Disability Rights Section

U.S. Department of Justice, Civil Rights Division

Cell: 202-353-5101

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